

EXHIBIT 15

Redacted Excerpts of Deposition of Denitza Batchvarova

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)
FITCH, on behalf of)
themselves and all others)
similarly situated,)
)
Plaintiffs,)
)
vs.) Case No.
) 2:15-cv-01045-RFB-(PAL)
)
ZUFFA, LLC, d/b/a Ultimate)
Fighting Championship and)
UFC,)
)
Defendant.)
)

VIDEOTAPED DEPOSITION OF DENITZA BATCHVAROVA

Las Vegas, Nevada

January 25, 2017

9:11 A.M.

Reported by:
Sarah Padilla, CCR NO. 929
Job No. 48403

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8 (Pages 26 to 29)

DAVID FELDMAN WORLDWIDE, INC.
450 Seventh Avenue - Ste 500, New York, NY 10123 1.800.642.1099

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1 **Q** Okay. Do you know if fighters at the time
2 were being compensated under that interpretation?
3 A I believe so. There was nothing that
4 would lead me to believe we weren't compensating our
5 athletes based on our agreements with them.
6 **Q** Okay. So I am handing you what has been
7 marked Exhibit 101, which is Bates stamped
8 ZFL-1103001 and attachment Bates stamp ZFL-1103002.
9 (Exhibit 101 was marked.)
10 BY MR. SILVERMAN:
11 **Q** Let me know when you have had a chance to
12 look through it.
13 A Okay.
14 **Q** Did you write this e-mail in the ordinary
15 course of business?
16 A I did.
17 **Q** And did you draft the attachment as well?
18 A I did.
19 **Q** Okay. Can you describe what the
20 attachment is?
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 don't think we even got to putting together a list
2 of, "Hey, who is coming up?" I know that Tracy Long
3 always has a list of contracts that are expiring.
4 So I think that is probably where it would have gone
5 anyhow.

6 **Q Was this plan shared with Lorenzo, do you
7 know?**

8 A I don't recall.

9 **Q Did you ever have any meetings with anyone
10 about this plan?**

11 A Besides Nakisa who I sent this to, I don't
12 believe it got anywhere further.

13 [REDACTED] 13
14 [REDACTED] 14
15 [REDACTED] 15
16 [REDACTED] 16
17 [REDACTED] 17
18 [REDACTED] 18
19 [REDACTED] 19
20 [REDACTED] 20
21 [REDACTED] 21
22 [REDACTED] 22
23 [REDACTED] 23
24 [REDACTED] 24
25 [REDACTED] 25

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23		23	Q And are there events that you believe have
24		24	been priced too high that have resulted in fewer
25		25	sell-throughs?

52 (Pages 202 to 205)

210

1 E R R A T A
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5 I wish to make the following changes,
6 for the following reasons:
7

8 PAGE LINE
9 _____ CHANGE: _____
10 REASON: _____
11 _____ CHANGE: _____
12 REASON: _____
13 _____ CHANGE: _____
14 REASON: _____
15 _____ CHANGE: _____
16 REASON: _____
17 _____ CHANGE: _____
18 REASON: _____
19 _____ CHANGE: _____
20 REASON: _____
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23 WITNESS' SIGNATURE _____ DATE
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